

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et al., §
§
§
Plaintiffs, §
§
§
v. §
§
§
PERDUE FARMS , INC., §
§
§
Defendant. §
§
§
CIVIL ACTION NO.
1:06-cv-01000-MEF-WC

**CONSENT MOTION FOR EXTENSION OF TIME FOR
PLAINTIFFS TO FILE THEIR RESPONSE
TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

Plaintiffs with the consent of Defendant in the above captioned case, and through its undersigned counsel, moves this Honorable Court for an extension of 7 days in which to file their Response to Defendant's Motion for Summary Judgment.

1. Plaintiffs requested Defendant agree to a 30 day extension and Defendant objected instead agreeing to a 7 day extension.
 2. As such, Counsel for all parties has consented to Plaintiffs' request for a 7 day extension subject to the approval of this Court.

3. Should the requested extension be granted, the response of Plaintiffs will be due to be filed on or before June 11, 2008.
4. Per the undersigned's conversation with the Clerk of the Court, Plaintiffs anticipate filing a Rule 56(f) Petition for Discovery before the expiration of the 7 day extension.

WHEREFORE, premises considered, Plaintiffs request the Honorable Court Grant this Motion and allow Plaintiffs until June 11, 2008 to file their Response.

Dated: May 30, 2008

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825
Birmingham, AL 35203
(205) 930-6900 (Phone)
(205) 930-6910 (Fax)

– and –

Lance H. Swanner
Samuel A. Cherry, Jr.
THE COCHRAN FIRM, P.C.
163 W. Main Street
P.O. Box 927
Dothan, AL 36302
(334) 793-1555 (Phone)
(334) 793-8280 (fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2008, I electronically filed the foregoing Motion with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

jkelly@morganlewis.com

lquamie@morganlewis.com

Sandra.reiss@odnss.com

/s/ Robert J. Camp
ROBERT J. CAMP